

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY**

In the Matter of )

Amendment of Subpart D of )  
Part 68 of the FCC's Rules )  
and Regulations )

RM 8621

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COMMENTS

AT&T respectfully submits the following Comments supporting the Petition for Rulemaking ("Petition") filed by the Telecommunications Industry Association ("TIA").

The Petition proposes amendments to every section in Subpart D of Part 68 of the Commission's Rules (47 C.F.R., Part 68, Subpart D), except § 68.316 on hearing aid compatibility, and conforming amendments to several sections in Subpart A. The purpose of these amendments is to harmonize the United States and Canadian technical requirements for authorization of terminal equipment connected to the telephone network.<sup>1</sup> As a result, terminal equipment meeting the single set of technical rules will

<sup>1</sup> The United States requirements are in Part 68. The Canadian requirements are in CS-03 issued by Industry Canada.

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satisfy the requirements of both countries. This should create efficiencies for manufacturers on both sides of the border, and trade between the United States and Canada will be fostered. Lower costs and an even more competitive marketplace will benefit consumers in both countries.

AT&T will not repeat the section-by-section substantive rationale for each proposed amendment contained in Exhibit A to the Petition. Rather, AT&T, as an active participant in the joint United States-Canadian deliberations, focuses on the harmonization process and provides illustrative examples of decisions made for the purpose of achieving harmonization.

The most significant decision in the interest of harmonization between the two countries was that the technical requirements should be designed to prevent network harms, defined as technical damage to the network, technical degradation of service, malfunction of billing equipment and safety risk to the craftspeople. Although this has traditionally been the Part 68 approach, the Canadian CS-03 standard included many provisions not designed merely to prevent network harms, but to achieve good equipment performance. For example, CS-03 included provisions requiring single line telephones to send network address signals permitting proper call completion. The Canadians agreed to delete performance-oriented provisions from their

CS-03. Correspondingly, the parties agreed to delete the vibration, temperature and humidity tests in § 68.302(a) and (b) on the basis that they were unnecessary to guard against network harm. Those tests were not included in CS-03.

Another related example of harmonization is the treatment of mechanical shock tests. Section 68.302(c) includes specific tests to determine the ability of all terminal equipment to withstand the shock of being dropped. Canadian CS-03 contains no such tests. The agreed upon harmonization was to include in both the United States and Canadian standards shock tests only for portable and desk-top items, which are likely to be carried or positioned so that being dropped is reasonably likely, but not to provide such a test for items weighing more than five kilograms.

Many of the proposed amendments are for the purpose of more clearly stating the requirements. The changes in § 68.308 contain examples of this aspect of the harmonization process. The table in present § 68.308(b) was extensively modified. Canadian CS-03 does not contain such a table but the Canadians will add it to their standard. The revised Canadian standard will contain the material on the local area data channel interface (§ 68.308(f)) and limitations on terminal equipment connected to subrate digital services (new § 68.308(h)(1)); no such provisions are in the current version of CS-03. The table in new

§ 68.308(h)(2) was added to both the United States and Canadian standards; the clear and convenient Canadian approach of providing the requirements in template form was adopted.

The foregoing are some examples of the harmonization process at work. Often there was no substantive difference between the United States and Canadian standards. Therefore, much of the re-writing of Part 68, Subpart D, consisted of taking the best language from the United States and Canadian standards.

The re-write which the Petition proposes be adopted is the product of extensive work by United States and Canadian subject matter experts. Although Commission staff did not believe this matter appropriate for negotiated rulemaking, inputs on an earlier draft were obtained from a broader segment of United States and Canadian interests at a seminar held at the suggestion of Commission staff (Petition, pp. 4-5). Technical concerns were thereafter addressed and further presentations to industry representatives occurred (id.).

The Canadian output of this activity is scheduled to be presented to Canada's Terminal Attachment Program Advisory Committee at its June, 1995 meeting and adoption at that time is expected. The additional steps required by Canadian administrative procedures will occur in the ensuing

months. The new standard should be effective in Canada by the end of this year. The Commission should achieve the same result in the United States by adopting the rules proposed in the Petition as promptly as Commission procedures permit.

Respectfully submitted,

AT&T CORP.

By



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Dated: May 1, 1995

CERTIFICATE OF SERVICE

I, Janice Knapp, hereby certify that on this  
1st day of May, 1995, copies of the foregoing Comments were  
mailed, postage prepaid to the following:

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May 1, 1995